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September 21, 2005

Mr. John E. Carter, Director
FDIC San Francisco Regional Office
25 Jessie St. at Ecker Sq. Suite 2300
San Francisco, CA 94105

Dear Mr. Carter:

I have many important tasks to address today but nothing more critical then to write this letter in order to protect the banking industry from the threat of added dominance from WalMart. I am concerned that their desire to gain a foot hold into the banking industry by way of ILC charter will only lead to more of a monopoly within their empire. May I get specific:

- Mixing banking and commerce is bad public policy that could jeopardize the impartial allocation of credit and create conflicts of interest. Congress reaffirmed its opposition to the mixing of banking and commerce in the Gramm-Leach Bliley Act. Imagine a WalMart Bank disfavoring small businesses that compete with favoring their suppliers in credit decisions, or requiring their suppliers to bank with WalMart Bank.
- WalMart has a history of de-stabilizing communities. With its vast resources, it could drive out community banks like it has driven out community grocery stores, pharmacies and hardware stores. Where would that leave our communities?
- The systemic risk posed by a WalMart Bank would be enormous. WalMart Bank controls 8% of the non-restaurant, non automotive sales in the U. S. With a branch of a WalMart Bank in every store, it would represent a dangerous and unprecedented concentration of economic power.

Thank you for your consideration.

Cordially,

A handwritten signature in cursive script that reads 'Patrick D. Novitzki'.

Patrick D. Novitzki
President and CEO

Neighbors You Can Bank On